

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**JAMES PETER CONLAN,
PLAINTIFF**

V.

**THE MID-ATLANTIC REGION
COMMISSION ON HIGHER EDUCATION
doing business as the Middle States
Association of Colleges and Schools and
the MIDDLE STATES COMMISSION ON
HIGHER EDUCATION (MSCHE);
JOHN DOE, insurer of MSCHE; RICHARD
ROE, insurer;
AND
LA ASOCIACION PUERTORRIQUENA DE
PROFESORES UNIVERSITARIOS, INC.
(APPU);
LA HERMANDAD DE EMPLEADOS
EXENTOS NO DOCENTES DE LA
UNIVERSIDAD DE PUERTO RICO
(HEEND);
THE SINDICATO DE TRABAJADORES DE
LA UNIVERSIDAD DE PUERTO RICO
(STUPR);
UNIÓN BONAFIDE DE OFICIALES DE
SEGURIDAD UPR (UBOS)
UPR-RP GENERAL STUDENT COUNCIL
AND
THE UNIVERSITY OF PUERTO RICO
(UPR),
THE UNIVERSITY OF PUERTO RICO
BOARD OF GOVERNORS (UPR JG); Mr.
Jorge L. Sánchez Colón M.D., Dr. Carlos
Pérez Díaz,
Dra. Gloria Butrón Castelli, Dr. Juan B.
Aponte Vázquez, Mr. Harold E. Soto
Fortuño, Dr. Edgard Resto Rodríguez, Mr.
Dennis Hickey Rivera,**

**Hon. Rafael Román Meléndez,
Mr. Fernando San Miguel Lloveras,
Esquire, Dra. Ana María García Blanco,**

CIVIL NO. 3:15-CV-02841 (CCC)

**Federal Question: All Writs Act
& Civil**

**Rights: Writ of Assize of Novel
Disseisin,**

**Writ of Assize of Nuisance;
Writ of Entry; Writ of Waste**

Federal Question: R.I.C.O.

**Injunctive Relief
and private plaintiff treble
damages**

enforcement

**Diversity: Fraudulent
Certification, Breach
of Warranty**

DEMAND FOR JURY TRIAL

**Mr. Rafael Escalera Rodríguez, Esquire,
Mr. Christian Arvelo Forteza,
AND
Uroyoán R. Walker-Ramos, Ph.D., Carlos
Severino, Ph.D.,
AND
FULANO DE TAL, INC., insurer of the
University of Puerto Rico
FULANA DE TAL, INC., insurer of the
University of Puerto Rico Board of
Governors
AND
The HON. ALEJANDRO GARCIA PADILLA,
Governor of the Commonwealth of Puerto
Rico,

DEFENDANTS**

**NOTICE OF APPEARANCE WITHOUT SUBMITTING TO THE COURT'S
JURISDICTION AND REQUESTING A 30 DAY EXTENSION, UNTIL JUNE 30,
2016 TO ANSWER OR OTHERWISE PLEA**

TO THE HONORABLE COURT:

**COMES NOW, Guillermo Guasp-Pérez, on his official capacity as
President of the University of Puerto Rico Río Piedras campus Student
Council,** through the undersigned attorney, and very respectfully requests,
without submitting to the Court's jurisdiction¹, as follow:

¹ Although the appearing party has just retained the undersigned counsel and is in the process of analyzing the complaint and developing its defense, it is very respectfully submitted that, form a perusal of the allegations, the appearing party understands in good faith that there might be a viable jurisdictional argument that will be developed in a future filing. Thus, the instant motion should not be construed in any way as a submission to the Court's jurisdiction or as a waiver of any potential jurisdictional arguments.

1. The undersigned attorney has been recently retained by Guillermo Guasp-Pérez, on his official capacity as President of the University of Puerto Rico Río Piedras campus Student Council to represent its interest in the case of reference.

2. The undersigned attorney thus respectfully requests from this Honorable Court that he be accepted as Mr. Guasp-Pérez's attorney of record.

3. Although the instant case is at a relatively early stage, there is available documentation on complex factual and legal issues that needs to be analyzed and considered to adequately represent Mr. Guasp-Pérez's interest. I

4. In order to familiarize with said documentation and to file an adequate response or otherwise plea, the appearing party respectfully requests that it be given a 30 day period, until June 30, 2016, to file its responsive allegation.

5. Said period will not affect the procedures nor prejudice the plaintiff in any way; yet, it will allow the undersigned to gain the necessary understanding of the case to adequately represent Mr. Guasp-Pérez during the course of this litigation.

WHEREFORE, it is respectfully requested from this Honorable Court that: (a) the undersigned attorney be entered on record as Mr. Guasp-Pérez's legal representation; and (b) a 30 day period be given, until June 30, 2016, in order for the undersigned to familiarize with the available documentation and to file an adequate response or otherwise plea.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, I electronically filed an exact copy of the foregoing with the Clerk of the Court using the CM/ECF system, which

will send notification of such filing to the parties of record, or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

RESPECTFULLY SUBMITTED.

In Carolina, Puerto Rico, this 31st day of May, 2016.

S/ Alex Omar Rosa-Ambert
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